

THE BASIL LAW GROUP
A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW

**32 EAST 31ST STREET, 9TH FLOOR
NEW YORK, NY 10016
TELEPHONE: 917-994-9973
E-FAX: 831-536-1075
ROBERTJBASIL@RJBASIL.COM**

JANUARY 13, 2021

VIA ECF

Hon. Roanne L. Mann, U.S.M.J.
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *JKAYC, LLC v. Noah Bank*
Case No.: 1:20-cv-00943-(PKS)(RLM)
Letter motion seeking limited stay

Your Honor:

This office has represented the plaintiff, JKAYC, LLC, in the above action. By Memorandum and Order filed January 4, 2021, ECF Doc. 30 (the “Order”), your predecessor magistrate in this action. Hon. Steven M. Gold, U.S.M.J., disqualified this firm from that representation. Both the plaintiff and this firm wish to file objections to Judge Gold’s Order and to move to set it aside, as we are permitted to do pursuant to Fed. R. Civ. P. 72(a).

While we presume that Judge Gold had no intention of depriving us of our right to file objections to his Order, we note that the language appearing in the Order’s conclusion (referring to this law firm as “BLG”) may perhaps be read to bar this office from filing objections on plaintiff’s behalf:

For the reasons set forth above, Noah Bank’s motion to disqualify Robert J. Basil and BLG from representing JKAYC is granted.

Accordingly, we seek a limited stay of the Order solely to permit us to file objections on the plaintiff’s behalf, and to permit us to continue to represent the plaintiff in connection with those objections until they are resolved by the Court. As the Order does not bar BLG or me from filing objections on our own behalf, we are proceeding to do so, but our client JKAYC also wishes to join in that application.

THE BASIL LAW GROUP, P.C.

Application for Limited Stay

Page 2

In accordance with Local Civ. R. 37.3, we have conferred in good faith with defendant's counsel seeking consent to the relief we seek, but they have declined to provide such consent. We thank you very much for your consideration of the foregoing.

Respectfully submitted,

/s Robert J. Basil

Robert J. Basil